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***Counsel for Massachusetts Only Indirect
Purchaser Plaintiffs Gianasca and
Caldwell***

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION

Master File No. 4:07-cv-5944
Related MDL No. 1917

This Document Relates to
All Indirect Purchaser Actions

**JOINT STIPULATION AND {PROPOSED}
ORDER TO EXTEND BRIEFING SCHEDULE
FOR PROPOSED DEFENDANTS' MOTION
FOR SANCTIONS**

Hearing Date: March 2, 2023
Time: 2:00 pm
Courtroom: Via videoconference
Judge: Hon. Jon S. Tigar

Pursuant to Civil Local Rule 6-2, Plaintiffs and the undersigned Intervenors-Proposed
1 Defendants (the “Proposed Defendants”), by and through their respective undersigned counsel,
2 hereby agree and stipulate as follows:

3 WHEREAS, on December 22, 2022, certain Proposed Defendants filed their Motion for
4 Sanctions (ECF No. 6126), for which the Response is currently due January 5, 2023;

5 WHEREAS, on or about December 23, 2022, the Northeast and much of the United
6 States were hit with a severe winter storm which knocked out power to certain areas;

7 WHEREAS, Plaintiffs’ Counsel have requested additional time to brief their response on
8 the basis that certain of Plaintiffs’ Counsel was residing in the Northeast during the pendency of
9 the Christmas holidays and lost power due to the severe storm;

10 WHEREAS, the parties agree that good cause exists to provide additional time to brief
11 their respective opposition and reply to the motion for sanctions, because, among other reasons,
12 of the power outage in the Northeast, the need to coordinate among multiple law firms, and the
13 complexity of the procedural history in this matter;

14 WHEREAS, the parties have mutually agreed to extend the time for Plaintiffs to file their
15 opposition to the motion for sanctions by seven (7) days, and to extend the time for Proposed
16 Defendants to file their replies by seven (7) days;

17 WHEREAS, the parties met and conferred, and have agreed upon the following briefing
18 schedule: Plaintiffs should have until January 12, 2023, to file their opposition brief, and
19 Proposed Defendants should have until January 26, 2023, to file their reply;

20 WHEREAS, the parties agree that the hearing currently set for March 2, 2023 at 2:00 pm
21 via video conference shall not be affected by the proposed extension to the briefing schedule.

1 NOW, THEREFORE, Massachusetts Counsel and Proposed Defendants respectfully
2 request that the Court enter and Order granting Massachusetts Counsel an additional seven (7)
3 days, to January 12, 2023, to file their Response to the Motion for Sanctions and extending the
4 time for Proposed Defendants to file their replies by seven (7) days, to January 26, 2023.

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6 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

7 Dated: January 5, 2023


8 HONORABLE JON SOTIGAR
9 UNITED STATES DISTRICT JUDGE

10 Dated: January 5, 2023

11 Respectfully submitted,

12 */s/ Robert J. Bonsignore*
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Defendants Panasonic Corporation (f/k/a
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Panasonic Corporation of North America,
and MT Picture Display Co., Ltd.¹*

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¹ MT Picture Display Co., Ltd. has been dissolved and completed final liquidation proceedings in Japan on May 23, 2019.

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